

## Element Performance Inspection (EPI) Data Collection Tool

### 2.1.2 Content Consistency Across Manuals (OP)

#### ELEMENT SUMMARY INFORMATION

**Purpose of this Element** (certificate holder's responsibility):

- To ensure the certificate holder's current manual used for guidance of flight, ground operations, and management personnel is consistent in its content across manuals for conducting operations.

**Objective** (FAA oversight):

- To determine the effectiveness of the certificate holder's procedures in meeting the desired output of the process.
- To determine if the certificate holder follows its procedures, controls, process measurements, and interfaces for the Content Consistency Across Manuals process.
- To determine if there were any changes in the personnel identified by the certificate holder as having responsibility and/or authority for the Content Consistency Across Manuals process.

**Specific Instructions:**

- To accomplish this EPI, the inspector will accomplish a review of a certificate holder's manuals for content and consistency. The inspector will compare various manuals or sections of manuals to determine if policies and procedures in one manual/section conflict with the policies and procedures in another manual/section.

**Related EPIs:**

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#### SUPPLEMENTAL INFORMATION

**Specific Regulatory Requirements (SRRs):**

- SRRs:
  - 119.43(b)
  - 119.65(e)(1)
  - 119.65(e)(2)
  - 121.133(a)
  - 121.135(a)(1)
  - 121.135(a)(2)
  - 121.135(a)(4)
  - 121.135(b)
  - 121.135(b)(10)
  - 121.135(b)(11)
  - 121.135(b)(12)
  - 121.135(b)(13)
  - 121.135(b)(14)
  - 121.135(b)(15)
  - 121.135(b)(18)
  - 121.135(b)(2)
  - 121.135(b)(20)

- SRRs:
  - 121.135(b)(21)
  - 121.135(b)(22)
  - 121.135(b)(23)
  - 121.135(b)(3)
  - 121.135(b)(4)
  - 121.135(b)(5)
  - 121.135(b)(6)
  - 121.135(b)(7)
  - 121.135(b)(8)
  - 121.135(b)(9)
  - 121.141
  - 121.141(b)
  - 121.198(f)

**Related CFRs & FAA Policy/Guidance:**

- Related CFRs:
  - Intentionally left blank
- FAA Policy/Guidance:
  - FAA Order 8400.10, volume 3, chapter 15
  - HBAT 00-12

## EPI SECTION 1 - PERFORMANCE OBSERVABLES

**Objective:** (FAA oversight responsibility): The tasks and questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder follows its written procedures and controls and meets the established performance measures of the process. To accomplish this, questions have been generated to test both the outputs of the process as well as the process itself. Question 1 and its following subquestions are directed at the output(s) of the process, whereas questions 2-6, when answered, should be directed at the process itself.

### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review information listed in the Supplemental Information section of this DCT.
2.	Review the policies, procedures, instructions, and information for the Content Consistency Across Manuals process contained in the certificate holder's manual.
3.	Review the last accomplished associated safety attribute inspection (SAI) for this element with emphasis on the controls, process measurements, and interface attribute section responses.
4.	Observe the Content Consistency Across Manuals process to gain an understanding of the procedures, instructions, and information contained in the certificate holder's manual.
5.	Discuss the Content Consistency Across Manuals process with the personnel (other than management) who perform the duties and responsibilities required by the process.

### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Determine whether the following performance measures were met:	
1.1.	Are the contents of the certificate holder's manual consistent across the various parts of the manual?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Are the contents of the certificate holder's manual consistent across various media in which the manual is presented (paper manuals, checklists, electronic means, microfiche, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
2.	Were the certificate holder's policies, procedures, instructions, and information contained in its manual for the Content Consistency Across Manuals process followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Were the Content Consistency Across Manuals process controls followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Did the records for the Content Consistency Across Manuals process comply with the instructions provided in the certificate holder's manual?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Were the process measurements for the Content Consistency Across Manuals process effective in identifying problems or potential problems and providing corrective action for them?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
6.	Did personnel properly handle the associated interfaces by complying with other written policies, procedures, instructions, and information that are related to this element?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<b>EPI SECTION 1 - PERFORMANCE OBSERVABLES</b> <b>Drop-Down Menu</b>	
1.	Personnel.
2.	Tools and Equipment.
3.	Technical Data.
4.	Procedures, policies or instructions or information.
5.	Materials.
6.	Facilities.
7.	Controls.
8.	Process Measures.
9.	Interfaces.
10.	Desired Outcome.
11.	Other.

## EPI SECTION 2 - MANAGEMENT RESPONSIBILITY & AUTHORITY OBSERVABLES

**Objective:** The questions in this section address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

### Tasks

	To meet this objective, the inspector must accomplish the following tasks:
	NOTE: If no personnel or major program changes (as defined by the principal inspector (PI)) affecting the responsibility or authority attributes for this element have occurred since the last SAI and/or EPI was accomplished, then do not perform tasks 3-6, below. Answer questions 1 and 2, below, and provide the name/title.
1.	Identify the person who has overall responsibility for the Content Consistency Across Manuals process.
2.	Identify the person who has overall authority for the Content Consistency Across Manuals process.
3.	Review the duties and responsibilities for those who manage the Content Consistency Across Manuals process documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.
5.	Discuss the Content Consistency Across Manuals process with the management personnel identified in tasks 1 and 2.
6.	Evaluate the qualifications and work experience of the management personnel identified in tasks 1 and 2.

### Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Is there a clearly identified person who is responsible for the quality of the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
2.	Is there a clearly identified person who has authority to establish and modify the certificate holder's procedures, policies, instructions, and information for the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
3.	Does the responsible person know that he/she has responsibility for the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
4.	Does the person with authority know that he/she has authority for the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
5.	Does the person with responsibility for the Content Consistency Across Manuals process meet the qualification standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
6.	Does the person with authority to establish and modify the Content Consistency Across Manuals process meet the qualification standards?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

		<input type="checkbox"/> No Change
7.	Does the person with responsibility understand the controls, process measurements, and interfaces associated with the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
8.	Does the person with authority understand the controls, process measurements, and interfaces associated with the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
9.	Does the responsible person know who has authority to establish and modify the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change
10.	Does the individual with authority know who has the responsibility for the Content Consistency Across Manuals process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> No Change

<b>EPI SECTION 2 - MANAGEMENT RESPONSIBILITY &amp; AUTHORITY OBSERVABLES</b>	
<b>Drop-Down Menu</b>	
1.	Assignment of responsibility.
2.	Assignment of authority.
3.	Does not understand procedures, policies or instructions and information.
4.	Does not understand controls.
5.	Does not understand process measurements.
6.	Does not understand interfaces.
7.	Span of control.
8.	Position vacant.
9.	Other.